

## Message

**From:** Gry Ahlefeld-Engel [/O=TOLDSKAT/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BF08BE88C46F4231A8D5BC823CD20291-W24045]  
**Sent:** 4/25/2019 3:49:12 PM  
**To:** PFI002@politi.dk  
**Subject:** SV: SV: SV: SV: Forlig

Det har jeg ikke hørt. Jeg kan lige høre Boris, om han har hørt andet.

Venlig hilsen

Gry Ahlefeld-Engel  
 Underdirektør  
 kompleks Svig

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 Gry.Ahlefeld-Engel@SKTST.DK

Skattestyrelsen  
 Kratbjerg 236, Fredensborg  
 www.sktst.dk

Skattestyrelsen er en del af Skatteforvaltningen

-----Oprindelig meddelelse-----  
 Fra: PFI002@politi.dk [mailto:PFI002@politi.dk]  
 Sendt: 25. april 2019 17:44  
 Til: Gry Ahlefeld-Engel <Gry.Ahlefeld-Engel@SKTST.DK>  
 Emne: SV: SV: SV: SV: Forlig

:-) :-)

Så de erkender sig ikke skyldige og vil have en samlet løsning som banken?

-----Oprindelig meddelelse-----  
 Fra: Gry Ahlefeld-Engel [mailto:Gry.Ahlefeld-Engel@SKTST.DK]  
 Sendt: 25. april 2019 17:38  
 Til: Fiig, Per (PFI002)  
 Emne: SV: SV: SV: SV: Forlig

Altid opløftende med sådanne opmuntrende ord. Åbenbart.

Hvis dit spørgsmål går på om vi løser dem fra strafferetligt ansvar med forliget, så er svaret nej. De håber på, at deres velvillighed i det civilretlige spor vil have en afsmittende effekt i det strafferetlige, men intet yderligere.

//Den fatsvage

Venlig hilsen

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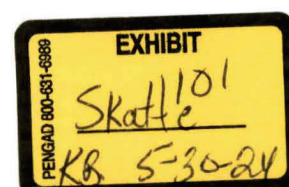
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-----Oprindelig meddelelse-----  
 Fra: PFI002@politi.dk [mailto:PFI002@politi.dk]  
 Sendt: 25. april 2019 17:09

CONFIDENTIAL

SKAT\_MAPLEPOINT\_00000235



Til: Gry Ahlefeld-Engel <Gry.Ahlefeld-Engel@SKTST.DK>  
 Emne: SV: SV: SV: Forlig

Er du fattesvag :-)

-----Oprindelig meddelelse-----

Fra: Gry Ahlefeld-Engel [mailto:Gry.Ahlefeld-Engel@SKTST.DK]  
 Sendt: 25. april 2019 13:07  
 Til: Fiig, Per (PFI002)  
 Emne: Ang: SV: SV: SV: Forlig

Jeg er ikke sikker på at jeg forstår dit spørgsmål.

---

Fra: PFI002@politi.dk <PFI002@politi.dk>  
 Dato: 25. april 2019 kl. 13.01.47 CEST  
 Til: Gry Ahlefeld-Engel <Gry.Ahlefeld-Engel@SKTST.DK>  
 Emne: SV: SV: SV: Forlig

Høpner rejste i øvrigt spørgsmål om, hvorvidt de ultimative ejere (de amerikanske aktionærer) også fik afklaret deres samlede forhold i forbindelse med forliget. Han antydede, at det også ville omfatte spørgsmålet om deres position i forhold til straffesagen. Har du hørt noget om det?

-----Oprindelig meddelelse-----

Fra: Gry Ahlefeld-Engel [mailto:Gry.Ahlefeld-Engel@SKTST.DK]  
 Sendt: 25. april 2019 12:58  
 Til: Fiig, Per (PFI002)  
 Emne: Ang: SV: SV: Forlig

Jeg har intet hørt. Jeg havde fået forståelsen af at den var lukket. Du hører fra mig når KA vender tilbage.

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Fra: PFI002@politi.dk <PFI002@politi.dk>  
 Dato: 25. april 2019 kl. 12.57.05 CEST  
 Til: Gry Ahlefeld-Engel <Gry.Ahlefeld-Engel@SKTST.DK>  
 Emne: SV: SV: Forlig

Jep, men Høpner havde supplerende spørgsmål (vistnok i går), som endnu ikke er besvaret. Så det er ikke alene et KA-problem :-)

-----Oprindelig meddelelse-----

Fra: Gry Ahlefeld-Engel [mailto:Gry.Ahlefeld-Engel@SKTST.DK]  
 Sendt: 25. april 2019 12:55  
 Til: Fiig, Per (PFI002)  
 Emne: Ang: SV: Forlig

Den skulle være sendt før påske? Jeg tjekker lige op med Boris. Vender tilbage vedr tirsdag.

---

Fra: PFI002@politi.dk <PFI002@politi.dk>  
 Dato: 25. april 2019 kl. 12.34.54 CEST  
 Til: Gry Ahlefeld-Engel <Gry.Ahlefeld-Engel@SKTST.DK>  
 Emne: SV: Forlig

Kære Gry

Manglende afklaring om LOI blokerer for den videre proces, jf. Høpner. Kan du presse lidt på hos KA?

Morten har ikke behov for at deltage i et møde, så det er sikkert kun mig, da Niels er ude. Hvad siger I til tirsdag kl. 10?

Bedste hilsner  
 Per

Fra: Gry Ahlefeld-Engel [mailto:Gry.Ahlefeld-Engel@SKTST.DK]  
 Sendt: 24. april 2019 21:44  
 Til: Fiig, Per (PFI002)  
 Emne: Forlig

Kære Per,

Vores forligsforhandlinger har taget fart igen, og jeg skal formentlig til NYC i uge 20 til et afsluttende forhandlingsmøde. Der vil formentlig på forhandlingsmødet være behov for, at vi kan nikke til forligsaftaleteksten med forbehold alene for endelig formel godkendelse og underskrift i DK. Jeg tænker,

at der på den baggrund er behov for, at vi mødes i næste uge, således at vi vores myndigheder imellem er helt på linje i forhold til vilkårene i aftalen.

Hvordan ser det ud for jer. Steen og jeg kan begge rokere lidt rundt mandag, tirsdag og onsdag eftermiddag i næste uge?

//Gry (der synes det kunne ha været lirtet at kunne skrive 'elementer' i sted i ovenstående. Teksten kalder ligesom på det.)

Venlig hilsen

Gry Ahlefeld-Engel  
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Gry.Ahlefeld-Engel@SKTST.DK<mailto:Gry.Ahlefeld-Engel@SKTST.DK>

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Message

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**From:** Gry Ahlefeld-Engel <gry.ahlefeld-engel@sktst.dk>  
**Sent:** Thu, 25 Apr 2019 15:49:12 +0000  
**To:** pfi002@politi.dk  
**Subject:** RE: RE: RE: RE: Settlement

I have not heard that. I can ask Boris if he's heard otherwise.

Best regards  
Gry Ahlefeld-Engel  
Deputy Director  
Complex Fraud

+45 72 37 36 62  
Gry.Ahlefeld-Engel@SKTST.DK

The Danish Tax Agency  
Kratbjerg 236, Fredensborg  
www.sktst.dk

The Danish Tax Agency is a part of the Danish Tax Administration

-----Original message-----  
From: PFI002@politi.dk [mailto:PFI002@politi.dk]  
Sent: 25 April 2019 17:44  
To: Gry Ahlefeld-Engel <Gry.Ahlefeld-Engel@SKTST.DK>  
Subject: RE: RE: RE: RE: Settlement

:-) :-)

So they are not pleading guilty and seeking a full resolution like the bank?

-----Original message-----  
From: Gry Ahlefeld-Engel [mailto:Gry.Ahlefeld-Engel@SKTST.DK]  
Sent: 25 April 2019 17:38  
To: Fiig, Per (PFI002)  
Subject: RE: RE: RE: RE: Settlement

Always uplifting with such encouraging words. Apparently.

If your question is whether we release them from criminal liability with the settlement, the answer is no. They hope their cooperation in the civil law track will have a mitigating effect in the criminal, but nothing more.

//the Feeble-minded

Best regards

Gry Ahlefeld-Engel  
Deputy Director  
Complex Fraud

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Gry.Ahlefeld-Engel@SKTST.DK

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-----Original message-----  
From: PFI002@politi.dk [mailto:PFI002@politi.dk]  
Sent: 25 April 2019 17:09

To: Gry Ahlefeld-Engel <Gry.Ahlefeld-Engel@SKTST.DK>  
Subject: RE: RE: RE: RE: Settlement

Are you feeble-minded :-).

-----Original message-----

From: Gry Ahlefeld-Engel [mailto:Gry.Ahlefeld-Engel@SKTST.DK]  
Sent: 25 April 2019 13:07  
To: Fiig, Per (PFI002)  
Subject: RE: RE: RE: RE: Settlement

I'm not sure I understand your question.

---

From: PFI002@politi.dk <PFI002@politi.dk>  
Date: 25 April 2019 13.01.47 CEST  
To: Gry Ahlefeld-Engel <Gry.Ahlefeld-Engel@SKTST.DK>  
Subject: RE: RE: RE: Settlement

Hopner also raised the question if the ultimate owners (US shareholders) got clarified their overall relationship in connection with the settlement. He indicated that it will also cover the question of their position in relation to the criminal case. Have you heard anything about that?

-----Original message-----

From: Gry Ahlefeld-Engel [mailto:Gry.Ahlefeld-Engel@SKTST.DK]  
Sent: 25 April 2019 12:58  
To: Fiig, Per (PFI002)  
Subject: RE: RE: RE: Settlement

I haven't heard anything. It was my understanding that it was closed. You'll hear from me when Kammeradvokaten gets back.

---

From: PFI002@politi.dk <PFI002@politi.dk>  
Date: 25 April 2019 kl. 12.57.05 CEST  
To: Gry Ahlefeld-Engel <Gry.Ahlefeld-Engel@SKTST.DK>  
Subject: RE: RE: Settlement

Yep, but Hopner had supplemental questions (probably yesterday) that are still not answered. So it's not just a Kammeradvokaten problem. :-)

-----Original message-----

From: Gry Ahlefeld-Engel [mailto:Gry.Ahlefeld-Engel@SKTST.DK]  
Sent: 25 April 2019 12:55  
To: Fiig, Per (PFI002)  
Subject: RE: RE: Settlement

That should be sent before Easter? I'll just check up with Boris. Will Get back regarding Thursday.

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From: PFI002@politi.dk[PFI002@politi.dk]  
Date: 25 April 2019 12:34:54 CEST  
To: Gry Ahlefeld-Engel <Gry.Ahlefeld-Engel@SKTST.DK>  
Subject: RE: Settlement

Dear Gry

Lack of clarification about LOI blocks the process from going forward, see Høpner. Can you put a little pressure on KA?

Morten has no need to attend a meeting, so it is for sure only me, since Niels is out. What do you say to Tuesday at 10 AM?

Best regards  
Per

From: Gry Ahlefeld-Engel [mailto:Gry.Ahlefeld-Engel@SKTST.DK]  
Sent: 24 April 2019 21:44  
To: Fiig, Per (PFI002)  
Subject: Settlement

Dear Per,

Our settlement negotiations have picked up again and I will likely be going to NYC in week 20 for a final negotiation meeting. There will likely be a need at the negotiation meeting for us to give a nod to the settlement agreement text subject only to final formal approval and signature in DK. I think, based on that, that there is a need for us to meet next week so that we are completely aligned between our authorities with respect to the terms of the agreement.

How does that look for you. Steen and I can both arrange a bit around Monday, Tuesday and Wednesday afternoon next week?

//Gry (it seems it might have been better to write 'elements' instead in the above. It just suits the text.)

Best regards

Gry Ahlefeld-Engel  
Deputy Director  
Complex Fraud

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Gry.Ahlefeld-Engel@SKTST.DK <mailto:Gry.Ahlefeld-Engel@SKTST.DK>

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